

# **ADOT FTA Subrecipients Title VI Compliance Requirements**

## **ADOT Civil Rights Office**

206 S. 17<sup>th</sup> Ave Rm 183

Phoenix, AZ 85007

Office: 602-712-8946

Email: [CivilRightsOffice@azdot.gov](mailto:CivilRightsOffice@azdot.gov)

# OVERVIEW

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The Arizona Department of Transportation (ADOT) is a recipient of federal financial assistance. All recipients and pass-through entities (subrecipients) are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (“Title VI”).



# Title VI of the Civil Rights Act of 1964

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.” (42 USC 200d)



# Program or Activity Applies institution-wide

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Civil Rights Restoration Act of 1987- added the requirement that Title VI applies institution-wide; it is *not* limited to the program that receives federal funding (e.g., planning, capital, operations)



# PURPOSE of TRAINING

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To ensure all ADOT FTA Subrecipients are aware and abide by the provisions of Title VI and similar statutes. This training aims to provide guidance on the minimum requirements to be in compliance with FTA rules, laws and regulations.



# Procedures for Assuring Title VI Compliance and Enforcement -General Requirements

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1. Policy Statement Indicating Title VI Compliance
2. Title VI Notice to the Public
3. Title VI Complaint Procedures
4. Title VI Complaint Form
5. List of Title VI Investigations, Complaints, and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan (LEP)
8. Membership of Non-elected Committees Table
9. Monitoring for Sub-Recipient Title VI Compliance
10. Title VI Equity Analysis (New facilities only)
11. Board Meeting Minutes

# Board Meeting Minutes

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FTA **REQUIRES** a **copy** of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the Title VI Program Plan including the Policy Statement.



# PROVIDE A POLICY STATEMENT

- ❑ Expressed Commitment to the Title VI Program
- ❑ Delegation of Authority to the Title VI Program Coordinator/Staff Person with knowledge of Title VI requirements with contact information.
- ❑ Must be signed by head of agency.
- ❑ Circulated throughout the agency and made available to the public
- ❑ Must be updated if administration changes or every three years.





# NOTICE TO THE PUBLIC

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Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI.



# NOTICE TO THE PUBLIC

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- Must state that the Program operates without regard to race, color, or national origin.
- Must state that a complainant can file directly with the subrecipient.
- Must list procedures to file a Title VI complaint
- Must list procedures to request additional information on the Title VI obligations.
- Must include the statement: “If information is needed in another language, then contact (XXX) XXX-XXXX.” *(This should be stated in English and in any other language(s) spoken by limited English proficiency (LEP) populations that meet the Safe Harbor threshold)*
- You must indicate in your Title VI Program Plan where the notice is posted and available to the public.

# WHERE TO POST YOUR NOTICE TO THE PUBLIC

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- The Notice to the Public must be displayed at the following locations:
  - On your agency's website
  - At the office's reception desk
  - In any public meeting rooms or facilities
- The “Notice to the Public” should be placed in areas with frequent customer traffic.
- Many agencies display Title VI “Notice to the Public” in transit facilities (e.g., headquarters, transit shelters and stations, etc.), and on transit vehicles (e.g., buses, rail cars, etc.).

# Example:

Notifying the Public of Rights Under Title VI

## THE CITY OF USA

- ▶ The City of USA operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of USA.
- ▶ For more information on the City of USA's civil rights program, and the obligations and procedures to file a complaint, contact 800-656-1234, (TTY 800-656-4567); email [title.VIcomplaint@abc.org](mailto:title.VIcomplaint@abc.org); or visit our administrative office at 1234 Center Street, Anywhere, CA, 17970. For more information, visit [www.city.usa.ca.us](http://www.city.usa.ca.us)
- ▶ A complainant may file a complaint directly with the Arizona Department of Transportation or the Federal Transit Administration by filing a complaint directly with the corresponding office of Civil Rights: **ADOT**: ATTN Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- ▶ If information is needed in another language contact, 800-656-1234 *MAKE SURE THIS SENTENCE IS ALSO PROVIDED IN THE OTHER LANGUAGE(S)*

# Example: ADOT's "Notice to the Public"



## ADOT'S TITLE VI NOTICE TO THE PUBLIC

The Arizona Department of Transportation (ADOT) hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, national origin, age or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which ADOT receives Federal financial assistance.

Any person, who believes his/her Title VI protection has been violated, may file a complaint. Any such complaint must be in writing and filed with the ADOT Civil Rights Office, Title VI Program Manager within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the ADOT Civil Rights Office by contacting:

## AVISO PUBLICO DE ADOT SOBRE EL TITULO VI

El Departamento de Transportación del Estado de Arizona ADOT da aviso al publico que es la norma de esta agencia asegurar cumplimiento total con el Título VI de la Ley de los Derechos Civiles de 1964, la Ley de Restauración de 1987, y artículos relacionados y regulaciones en todos los programas y actividades. El Título VI requiere que ninguna persona sera discriminada por razon de raza, color, pais de origen, sexo, edad o discapacidad; sera excluida de participar en, denegar servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

Cualquier persona que crea que se ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito con la Oficina de Derechos Civiles de ADOT dentro de los ciento ochenta (180) días de la fecha en que se alega que la discriminación ocurrió. Para recibir formularios de reclamo por favor póngase en contacto con la oficina ADOT Oficina de Derechos Civiles:

**LUCY SCHRADER**  
TITLE VI PROGRAM MANAGER

**ADOT Civil Rights Office**  
206 S. 17th Avenue, Mail Drop 155-A  
Phoenix, AZ 85007  
602.712.8946  
602.239.6257 FAX

azdot.gov

# COMPLAINT PROCEDURES

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In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients **must** develop procedures for investigating and tracking Title VI complaints filed against them and make it available to the public.



# COMPLAINT PROCEDURES cont..

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- A Subrecipient's Title VI Program Plan must include a copy of the agency's Title VI complaint procedure. The complaint procedure and complaint form **MUST** be available on the recipient's **website**. The Title VI Complaint procedure is a vital document.
- If **ANY** Limited English Proficient populations in your service area meet the threshold ( Five percent or 1000 persons), then the complaint procedure should be provided in English and **IN ANY OTHER LANGAGUES SPOKEN BY LEP PERSONS THAT MEET THE THRESHOLD .**

# COMPLAINT PROCEDURES must ...

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- State that “any person that believes she or he has been discriminated against on the basis of race, color, or national origin” may file a Title VI complaint
- Include:
  - Where to File and Who to File with
  - When to accept complaint (180 days from last incident)
  - Investigation & resolution (not to exceed 60 days from filing)
  - Notify ADOT within 7 days of the complaint being filed and send ADOT a closing report within 7 business days
  - If ADOT is investigating on behalf of the subrecipient, send the complaint to ADOT within 72 hours.
  - “If information is needed in another language, then contact (XXX) XXX-XXXX.” ***(This should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.)***



# COMPLAINT PROCEDURES must include...

- Jurisdiction Requirements (Who is the agency responsible for reviewing the complaint?)
- How will the agency respond to the filing of a complaint
- How will the agency respond to the resolution of a complaint
- Develop a system for tracking complaints
- Determine how will language assistance be provided?



### SAMPLE Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of USA Transit Authority (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The City of USA Transit Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has **XX** days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has **XX** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **XX** business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has **XX** days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590; or the Arizona Department of Transportation at 206 S. 17<sup>th</sup> Ave Mail drop 155 A, RM 183 Phoenix, AZ 85007.

# COMPLAINT FORM

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Recipients must create and make available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form **MUST** be available on the recipient's **website**. A recipient's Title VI Complaint Form shall specify the three classes protected by Title VI—race, color, and national origin—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination. If necessary, the procedure should be provided in English *and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.*



# COMPLAINT FORM

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## Requirement from FTA

- Must have 3 protected classes
  - Race
  - Color
  - National Origin
- Must be available online
- Must be written
- Must have the complainant's full contact information
- Must be signed by complainant

The sample below is provided for the purposes of guidance only.

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print TDD	Audio Tape Other	
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin Date of Alleged Discrimination (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
<b>Section IV:</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V:</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court <input type="checkbox"/> Local Agency _____			
Please provide information about a contact person at the agency/court where the complaint was filed.			
Name:			
Title:			
Agency:			
Address:			
Telephone:			
<b>Section VI:</b>			
Name of agency complaint is against:			
Contact person:			
Title:			
Telephone number:			

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature \_\_\_\_\_

Date \_\_\_\_\_

Please submit this form in person at the address below, or mail this form to:  
 City of USA, Title VI Coordinator  
 1234 Center Street  
 City of USA, State 11111



## Title VI Complaint Form

*Note: The following information is needed to assist in processing your complaint.*

### Complainant's Information:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Person Discriminated Against (someone other than complainant)

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Which of the following best describes the reason you believe the discrimination took place?

☐ Race/Color (Specify) \_\_\_\_\_ ☐ National Origin (Specify) \_\_\_\_\_  
☐ Sex (Specify) \_\_\_\_\_ ☐ Age (Specify) \_\_\_\_\_ ☐ Disability (Specify) \_\_\_\_\_

On what date(s) did the alleged discrimination take place? \_\_\_\_\_

Describe the alleged discrimination. Explain what happened and who you believe was responsible (if additional space is needed, add a sheet of paper).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List names and contact information of persons who may have knowledge of the alleged discrimination.

\_\_\_\_\_  
\_\_\_\_\_

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Check all that apply.

☐ Federal Agency ☐ Federal Court ☐ State Agency ☐ State Court ☐ Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Home Phone Number: \_\_\_\_\_ Work Phone Number: \_\_\_\_\_

Please sign below. You may attach any written materials or other information you think is relevant to your complaint.

\_\_\_\_\_  
Complainant Signature Date Number of attachments: \_\_\_\_\_

Submit form and any additional information to:

ADOT Civil Rights Office  
Title VI Program Manager  
206 S. 17th Avenue, Maildrop 155A  
Phoenix, AZ 85007  
Phone: 602.712.8946 • Fax: 602.239.6257  
[www.azdot.gov](http://www.azdot.gov)

# COMPLAINT LOG

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All recipients shall prepare and maintain a list of any complaints that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program Plan submitted to ADOT every grant submission.

# COMPLAINT LOG

## SAMPLE List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				



# Remember: **POST ON WEBSITE**

These 4 are vital documents **MUST** be posted on your external website

- Policy Statement
- Notice to the Public
- Complaint Form
- Complaint Process

If a LEP population meets the “Safe Harbor” threshold, please provide in those languages as well.

# PUBLIC PARTICIPATION PLAN

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A plan designed to include outreach to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program Plan submission. The public participation plan should include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.



# PUBLIC PARTICIPATION PLAN Cont...

- A written plan which engages the public with the opportunity to provide input on the decision making process for Federal Aid transportation projects and services.
- Describe strategies, procedures, and outcomes for ongoing public participation activities.
- Provide education that highlights Title VI components.
- Provide a disparate impact analysis for any new facilities before selection of preferred site.
- Advertisements with Local Media Resources and Minority Newspapers
- Direct Mailings
- Public Service Announcements
- Website, Radio and Television

# PUBLIC INVOLVEMENT AND PUBLIC PARTICIPATION TIPS

## Public Involvement should be:

- Early, often and continuous
- Provide opportunities for public to get involved in proposed transportation decisions
- Promote inclusive public participation, including low-income, minority, and LEP populations

## Public Participation Tips :

- Select accessible meeting times, locations
- Consider providing childcare and food during meetings
- Utilize social media to complement (*not replace*) other involvement techniques
- Use non-traditional methods (e.g., go to hair salons, street fairs, faith based institutions, etc.)

# LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Title VI and its implementing regulations require that recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient.



# (LEP) PLAN and Safe Harbor Thresholds

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Requires a recipient to provide written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, by the program/activity.

- Translation of non-vital documents, if needed, can be provided orally.



# Four Factor Analysis

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In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the **Four Factor Analysis** to determine the specific language services that are appropriate to provide. The Four Factor Analysis is an individualized assessment that balances the following four factors:

- 1) **Number** of LEPs eligible or likely to be encountered by your Federally funded program
- 2) **Frequency** that LEPs come into contact with program
- 3) **Nature** & importance of program to LEPs
- 4) **Resources available** and costs to program

# Four Factor Analysis

## Factor 1:

Number of LEPs eligible or likely to be encountered by your Federally funded program will be program-specific. In addition to the number or proportion of LEP persons served, the recipient's analysis should, at a minimum, identify:

- How do LEP persons interact with the recipient's agency?
- Who are the LEP communities? How many are there?
- What is the level of the literacy skills of LEP populations in their native languages? Will translation of documents will be an effective practice?
- LEP persons are underserved by the recipient due to language barriers?



# Four Factor Analysis

## Factor 2:

The frequency with which LEP persons come into contact with the program. Recipients should survey key program areas and assess major points of contact with the public, such as:

- The use of bus and rail service;
- The purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
- Participation in public meetings;
- Customer service interactions;
- Ridership surveys; and
- Operator surveys

# Four Factor Analysis

## Factor 3:

The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles.

- **<\*Best Practice\*>** Facilitating meetings with LEP persons is a method to inform the recipients on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.

# Four Factor Analysis

## Factor 4:

The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by:

- technological advances,
- reasonable business practices, and the
- sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies.

However: Costs can be used to justify an agency not using a resource; but only if it is a substantiated cost (Approved by ADOT).

# LANGUAGE ASSISTANCE PLAN

After completing the **Four Factor Analysis**, the recipient must use the results of the analyses to determine which language assistance services are appropriate.

Recipients **must** then develop an assistance plan to address the identified needs of the LEP population(s) it serves.



# LANGUAGE ASSISTANCE PLAN must...

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- Include the Four Factor Analysis results, with a description of the LEP population(s) served;
- Describe how language assistance services are provided by language;
- Describe how notice is provided to LEP persons about the availability of language assistance;
- Describe how the Language Assistance Plan is monitored, evaluated, and updated; and
- Describe how employees are trained to provide timely and reasonable language assistance to LEP populations.

# LANGUAGE ASSISTANCE PLAN

## Strategies...

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- Publish timetables and route maps in languages other than English
- Use Multi-language phone lines
- Use Multilingual staff in information booths
- Use Pictograms/ “I Speak” Cards
- Use Multi-language announcements at stations and on vehicles
- Advertise in ethnic media
- Translate vital documents into the language of frequently encountered LEP groups

# Membership of Non-elected Committees

- Do you have a transit-related, non-elected planning boards, advisory councils or committees, or similar committees?
- Do you select the members?
- If yes, then provide a table depicting the racial breakdown of the membership of those committees
- And, Include a description of efforts made to encourage the participation of minorities on such committees.

	Caucasian	Latino	African American	Asian American	Native American
Population			<i>Suggested Section</i>		
Committee 1					
Committee 2					
Committee 3					

# Equity Analysis

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Transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or that otherwise meet the threshold, must conduct a Title VI equity analysis whenever they plan a fare change and/or a major service change. Things to remember:

- Equity analyses are required regardless of whether proposed changes would cause positive or negative impacts to riders.
- These, transit providers must conduct an equity analysis for all fare changes and for major service reductions and major service expansions.
- Financial exigencies and other special circumstances (e.g., economic hardships, size of transit provider's service area or staff) do not exempt transit providers from the requirement to conduct equity analyses.



# Equity Analysis things to consider...

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- Have you started building a new facility? If Yes:
  - Equity analysis must be completed during the planning stage with where the project will be.
  - It Must engage in outreach to person potentially impacted by the siting of facilities Compare the equity impact of alternative sites
- Disparate impact?
  - Can build if there is a **substantial** legitimate justification (no alternate would have a less disparate impact)

**\*\*Please reach out to the ADOT Civil Rights Office if you are constructing a new facility to ensure this process is completed properly\*\***

# Monitoring Subrecipients

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- FTA is required to monitor ADOT
- ADOT is required to monitor and investigate its subrecipients
- Subrecipients are required to monitor and investigate their contractors, consultants and/or vendors



# Monitoring Subrecipients: things to remember...

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Any FTA recipient that extends Federal financial assistance to a subrecipient. Must monitor subrecipients for compliance with the regulations

- What process do you use to ensure all subrecipients are complying?
- Do you collect Title VI Program Plans from subrecipients and review those programs for compliance?

# Fixed Route Transit Providers

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- Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
- Provider of fixed route public transportation (or “transit provider”) means any entity that operates public transportation service, and includes States, local and regional entities, and public and private entities.

# Fixed Route Transit Providers

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Fixed Route Transit Providers **must** submit:

- Service Standards
- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode

# Fixed Route Transit Providers

- Anyone who operates 50 or more fixed route vehicles and are located in an Urbanized Area of 200,000 or more people must submit additional information
- Most recipients are not Fixed Route Transit Providers. Those who are, generally do not qualify for the additional requirements.
- **If you are a Fixed Route Transit Provider, please contact the ADOT CRO for specific information regarding your Title VI Plan**

# General Requirements Summary Points

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## Title VI Program Plan must include:

- A Title VI Policy Statement, Notice to the Public, Complaint Procedure, and Complaint Form
- Complaint Log: listing investigations, lawsuits, and complaints
- A Limited English Proficiency Plan and a Public Participation Plan
- A table depicting racial composition of membership of non-elected bodies, membership is selected by the recipient
- Subrecipient monitoring
- Submit an Equity Analysis if constructing a new facility (or possibly if Fixed Route Transit Provider)
- Title VI Program must be approved by the recipient's Board of Directors or appropriate governing entity

# Resources

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## **FTA Circular 4702.1B:**

- [http://www.fta.dot.gov/documents/FTA Title VI FINAL.pdf](http://www.fta.dot.gov/documents/FTA%20Title%20VI%20FINAL.pdf)
- [http://www.fta.dot.gov/documents/Title VI Overview 4702.1B 11.05.12 ER.pdf](http://www.fta.dot.gov/documents/Title%20VI%20Overview%204702.1B%2011.05.12%20ER.pdf)
- <http://www.lep.gov/>

## **DOJ Title VI Manual:**

- <http://www.justice.gov/crt/about/cor/coord/vimanual.php>



# **ADOT FTA Subrecipients Title VI Compliance Requirements**

**Dawn Jackson**

Title VI Non-Discrimination Program

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